

To: Nolan, Sean[senolan@pa.gov]
Cc: Lazor, Nicholas[nlazor@pa.gov]; Hyden, Loretta[Hyden.Loretta@epa.gov]
Sent: Wed 7/19/2017 11:50:58 AM
Subject: RE: Exceptional Event Analyses Due Date

Thanks Sean,

I just wanted to reiterate that we are not certain which years EPA will use to calculate the DV for ozone designations.

From: Nolan, Sean [mailto:senolan@pa.gov]
Sent: Tuesday, July 18, 2017 5:59 PM
To: Hence, Kia <hence.kia@epa.gov>
Cc: Lazor, Nicholas <nlazor@pa.gov>; Hyden, Loretta <Hyden.Loretta@epa.gov>
Subject: Exceptional Event Analyses Due Date

Kia,

As we discussed on the phone during the afternoon on Tuesday, July 18, I am proposing to delay the submittal of our exceptional event analyses for the May 2016 and July 2016 events until later this year / early next year. This proposal was centered on our discussion surrounding the recent delay in the ozone designation period with respect to the 2015 ozone NAAQS and additional guidance from EPA OAQPS regarding exceptional event analyses as they relate to the 2017 ozone design value period.

During our conversation, I stated it was my belief that in delaying the ozone designations for the 2015 ozone NAAQS until October 2018, EPA will continue to follow recent unwritten guidance and use the most recent 3-year period of ozone data for these designations. By October 2018 (or even the June 2018 120-day letter period), the 2017 ozone data will be available for use by EPA for these designations. It is my understanding that EPA OAQPS intends to accept exceptional event analyses that impact the 2017 3-year ozone design value period (at least for ozone data collected in 2016 and 2017) up until May 31, 2018.

Based on our preliminary assessment of 2017 ozone data, there are multiple additional areas that have the potential to be designated as nonattainment for the 2015 ozone NAAQS. This

assessment, which was completed using data up through mid-July 2017, is incomplete as we still have the potential for daily 8-hour peak ozone concentrations (in excess of 70 parts per billion) through mid-September 2017. Having until May 31, 2018 would give us adequate time to assess the entire 2017 ozone season data to determine whether there still is a need for an exceptional event analysis. The following consideration will be placed on the data...

- 1.) Will a concurrence of an exceptional event with the inclusion of 2017 ozone data impact potential designations for the 2015 ozone NAAQS
- 2.) Specifically for the Philadelphia area, will a concurrence of an exceptional event with the inclusion of 2017 ozone data impact the potential classification (marginal vs. moderate) designation for the 2015 ozone NAAQS. The moderate threshold was proposed to start with a 3-year ozone design value of 81 ppb.

Let me know if you have any other specific questions regarding this request. I look forward to hearing back from you soon (also, please let me know if you disagree with my thought process here).

Best regards,

Sean

Sean P. Nolan | Chief, Quality Assurance and Data Assessment Section

Department of Environmental Protection | Bureau of Air Quality

Rachel Carson State Office Building

400 Market Street | Hbg PA 17105

Phone: 717.772.3377 | 717.772.2303

www.depweb.state.pa.us

